

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA, *on behalf of himself  
and all others similarly situated,*

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

**JOINT MOTION FOR EXTENSION OF DISCOVERY DEADLINES**

Plaintiff Joseph Mantha (“Plaintiff”) and Defendant QuoteWizard.com, LLC (“QuoteWizard”) (together, the “Parties”) hereby respectfully move the Court for an extension of the remaining deadlines in respect of expert discovery. The requested extension will not materially affect the timely resolution of this case.

In support of this Motion, the Parties state as follows:

1. On September 22, 2023, the Parties exchanged expert reports in accordance with this Court’s May 15, 2023 Order.
2. On October 11, 2023, the Parties jointly moved this Court for an extension of the deadline to produce Expert Rebuttal Report citing, among other things, medical issues affecting QuoteWizard’s expert witness, Jan Kostyun. *See* ECF No. 331.
3. On October 12, 2023, the Court allowed that motion. *See* ECF No. 332.
4. On November 24, 2023, the Parties exchanged Expert Rebuttal Reports in accordance with this Court’s Order.

5. The operative discovery schedule requires that expert depositions be completed by December 6, 2023.

6. The Parties agree that a modest extension of that deadline is necessary to (i) accommodate the expert witnesses' respective schedules and (ii) permit the Parties and their counsel additional time to review the experts' reports in preparation for each deposition.

7. Plaintiff's expert, Anya Verkhovskaya, has agreed to sit for her deposition on December 11, 2023.

8. QuoteWizard's expert, Jan Kostyun, has agreed to sit for his deposition on December 13, 2023.

9. QuoteWizard's expert, Harold Furchtgott-Roth, has agreed to sit for his deposition on December 18, 2023.

10. For these reasons, the Parties request that the remaining deadlines be extended as follows:

Expert Depositions:	December 18, 2023
Motion for Class Certification:	January 12, 2024
Opposition to Motion for Class Certification:	February 12, 2024

11. This Motion is made in good faith and not for the purpose of delay.

The Parties respectfully request that this Court allow this Motion and extend the remaining discovery deadlines for the limited purpose of accommodating the Parties' expert witnesses' schedules.

*Signatures on Following Page*

Dated: November 29, 2023

Respectfully submitted,

Joseph Mantha,

By his attorneys,

/s/ Edward A. Broderick

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Respectfully submitted,

QuoteWizard.com, LLC,

By its attorneys,

/s/ Kevin P. Polansky

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CERTIFICATE OF SERVICE

I, Daniel M. Curran, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: November 29, 2023

/s/ Kevin P. Polansky

Kevin P. Polansky